

**COMPLAINT**  
(for non-prisoner filers without lawyers)

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
FILED

2020 OCT -6 PM 3:38

CLERK OF COURT

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF WISCONSIN**

(Full name of plaintiff(s))

Jason Andujar  
2200 S 15th Street  
Milwaukee, WI 53215

v.

Case Number:

**20-C-1546**

(to be supplied by Clerk of Court)

(Full name of defendant(s))

H&R Block  
c/o Bonnie Birdsell  
Littler Mendelson, PC  
1201 Walnut Street, Suite 1450 Kansas City, MO

64106

A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at  
(State)

2200 S 15th Street Milwaukee, WI 53215  
(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Wisconsin H&R Block  
(Name)

Complaint - 1

is (if a person or private corporation) a citizen of Wisconsin

(State, if known)

and (if a person) resides at \_\_\_\_\_

(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for Her Block 1130 Miller Park Way, West Milwaukee  
(Employer's name and address, if known) 53214

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Rosanne Beasley - Racial discrimination

defendant would make racist jokes at work

while on clock once stated I was only hired

because I speak Spanish her comments in regards

to people of Latino or Spanish origins were very

undergradious and demeaning which came about

because I was hired to fill her prior

position as Manager of Office Team Lead Ass.

Also Rosanne attempted to file a complaint

against me in retaliation of a write up I gave her for  
her racial slurs as a manager which was ignored

Complaint - 2

Michael Voss - Unrightful termination and  
defamation of character. Michael Voss violated  
my rights as an employee by firing me on  
the spot in front of all other employees and clients  
Michael also lied and said I did not  
appear at an event that I myself  
scheduled and conducted which was a  
great success. Michael stated I was  
unpleasant to work with which goes against  
my character.

Scott Hanson - Unrightful termination  
discrimination against person, ethics, and  
work performance. Scott defamed my  
work character by stating nobody  
at work liked me which everyone found  
me as well as my performance with  
I performed at best proffession  
Scott also lied and said I was put  
on paid administrative leave which  
was a lie I was never paid.

Complaint-3

On Feb 3rd

Witnesses

Kim

706-844-4419

Sylvia

682-257-6476

phylicia Jones

Rafael Salas

Felicia Burks

Anna Antia

C. JURISDICTION

I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ \_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I ask that the courts find  
justice for me as a Wisconsin native  
who was discriminated against for  
being latino I also ask for Rosanne Beesley  
to be fired and that the company  
pay the grant amount for racial  
discrimination defamation of character  
as well as emotional distress and  
pay all wages from Feb 4th 2020  
till april 21, 2020 because they  
lied about the paid leave!

E. JURY DEMAND

I want a jury to hear my case.

- YES       - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 6 day of October 2020.

Respectfully Submitted,

Jason Ardyni

Signature of Plaintiff

414-530-7205

Plaintiff's Telephone Number

Repin-nationwidefynest@yahoo.com

Plaintiff's Email Address

2200 S 15th Street Milwaukee, WI

(Mailing Address of Plaintiff)

5-3215

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE  
FILING FEE**

I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.

I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN  
FILED

for the

Eastern District of Wisconsin

2020 OCT -6 P 3:41

Milwaukee Division

CLERK OF COURT

20-C-1546

Case No.

(to be filled in by the Clerk's Office)

Jason Andujar

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

H.E.R. Block

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**COMPLAINT FOR EMPLOYMENT DISCRIMINATION**

**I. The Parties to This Complaint**

**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Jason Andujar

Street Address

2200 S 15th Street

City and County

Milwaukee

State and Zip Code

WI 53215

Telephone Number

(414) 530-7205

E-mail Address

perin-nationwide2fynest@yahoo.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Her Block c/o Bonnie Birdsell  
Little Mendelson, PC  
1201 Walnut Street, Suite 1450  
Kansas City, MO 64106

Defendant No. 2

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Rosanne Braskey  
1130 Miller Park Way  
West Milwaukee  
53214  
(414) 645-3455

Defendant No. 3

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Michael Voss  
1130 Miller Park Way  
West Milwaukee  
WI 53214  
(414) 645-3455

Defendant No. 4

Name  
Job or Title (if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address (if known)

Scott Hanson  
1130 Miller Park Way  
West Milwaukee  
WI 53214  
(414) 573-7642

**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is

Name

HER BLOCK

Street Address

1150 Miller Parkway

City and County

West Milwaukee

State and Zip Code

53214

Telephone Number

(414) 645-3455

**II. Basis for Jurisdiction**

This action is brought for discrimination in employment pursuant to (*check all that apply*):

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

Other federal law (*specify the federal law*):

Relevant state law (*specify, if known*):

Relevant city or county law (*specify, if known*):

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

**A. The discriminatory conduct of which I complain in this action includes (check all that apply):**

Failure to hire me.  
 Termination of my employment.  
 Failure to promote me.  
 Failure to accommodate my disability.  
 Unequal terms and conditions of my employment.  
 Retaliation.  
 Other acts (specify): ethnicity

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

**B. It is my best recollection that the alleged discriminatory acts occurred on date(s)**

Feb, 3, 2020

**C. I believe that defendant(s) (check one):**

is/are still committing these acts against me.  
 is/are not still committing these acts against me.

**D. Defendant(s) discriminated against me based on my (check all that apply and explain):**

race racists jokes derogatory comments  
 color \_\_\_\_\_  
 gender/sex \_\_\_\_\_  
 religion \_\_\_\_\_  
 national origin American  
 age (year of birth) 1984 (only when asserting a claim of age discrimination.)  
 disability or perceived disability (specify disability)  
Mental disability

**E. The facts of my case are as follows. Attach additional pages if needed.**

HCR Block has defamed my character work  
ethic discriminated against my ethnicity wrongfully  
terminated my employment in retaliation  
of me filing a complaint and lied about putting me  
on administrative leave with pay!

*(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)*

**IV. Exhaustion of Federal Administrative Remedies**

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

Feb - 4 - 2020

B. The Equal Employment Opportunity Commission (check one):



has not issued a Notice of Right to Sue letter.



issued a Notice of Right to Sue letter, which I received on (date)

8-24-2020

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):



60 days or more have elapsed.



less than 60 days have elapsed.

**V. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

*My career was ruined loss of wages emotional  
distress my social security was effected by this  
im asking for the full penalty charges  
be paid by this company!*

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## VI. Certification and Closing

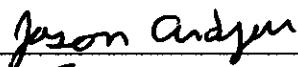
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

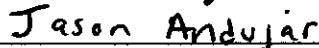
I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10-6-20

Signature of Plaintiff



Printed Name of Plaintiff



### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney



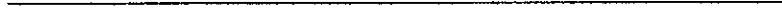
Printed Name of Attorney



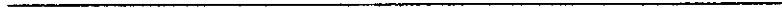
Bar Number



Name of Law Firm



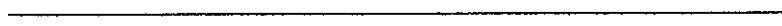
Street Address



State and Zip Code



Telephone Number



E-mail Address

